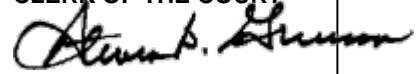


# Exhibit A



1 **ACOMP**  
 2 BRICE J. CRAFTON, ESQ.  
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**DISTRICT COURT****COUNTY OF CLARK, NEVADA**

MARIA QUEZADA, an individual;

Case No. A-22-849356-C

Dept. No. 14

Plaintiff,

**AMENDED COMPLAINT**

12 vs.  
 13 CARDENAS MARKETS, LLC, a Domestic  
 Limited Liability Company; DOES I-X,  
 inclusive; and ROE CORPORATIONS I-X,  
 inclusive;

Defendants.

16 Plaintiff complains of Defendants, and each of them, and for cause of action, alleges:

**GENERAL ALLEGATIONS**

18 1. Plaintiff, MARIA QUEZADA, is and at all times relevant herein, was, a resident  
 19 of the County of Clark, State of Nevada.

20 2. That at all times herein mentioned Defendants, CARDENAS MARKETS, LLC, a  
 21 domestic limited liability corporation; DOES 1 to 10, inclusive; and ROE CORPORATIONS 1  
 22 to 10; inclusive and each of them, are, and at all relevant times mentioned herein were,  
 23 corporations, limited liability companies, joint ventures, business entities, trusts, partnerships,  
 24 and/or individuals, all with their principal place of business in the County of Clark, State of

1 Nevada.

2 3. Whereas Defendants, CARDENAS MARKETS, LLC, DOES 1 to 10, inclusive  
3 and ROE CORPORATIONS 1 to 10, inclusive and each of them, are in casino and hotel business  
4 for profit.

5 4. That the above-entitled Court is the proper Court for this action because the injury  
6 to the Plaintiff occurred within the jurisdiction of said Court.

7 5. The true names and capacities of Defendants referred to herein as Does 1 to 10,  
8 inclusive, and Roe 1 to 10, inclusive and each of them, are unknown to Plaintiff at this time and  
9 Plaintiff is informed and believes and herein alleges they are in some way responsible for the  
10 damages incurred herein. Plaintiff will amend this Complaint to allege the true names and  
11 capacities when ascertained.

12 6. Plaintiff is informed and believes and herein alleges that, at all material times, each  
13 of the Defendants were the agents, servants, directors, managers, or employees of the co-  
14 defendants, and in doing the things herein alleged were acting in an agency, managerial or  
15 employment capacity within the course and scope of their authority, whose acts and conduct  
16 herein alleged were with the permission and consent of the co-defendants. Each of the  
17 Defendants' actions and conduct were known to, authorized and ratified by the co-defendants.  
18 Plaintiff is informed and believes and herein alleges, all the conduct by the individual Defendants,  
19 which was not outside the scope of their authority, was known to, authorized by, and ratified by  
20 the co-defendants.

21 7. Plaintiff is further informed, believes, and herein alleges that each Defendant  
22 designated herein as a DOE or ROE defendant, was responsible, negligently, or in some other  
23 actionable manner, for the events and happenings referred to herein, which proximately caused  
24 injury and damages to Plaintiff, as hereinafter alleged.

**FIRST CAUSE OF ACTION**  
**(Negligence – All Defendants)**

8. Plaintiff repeats, re-alleges, and incorporates by reference herein, each and every allegation contained in Paragraphs 1 through 7 as though fully set forth herein.

9. On or about April 26, 2021, (hereinafter referred herein as the “Subject Date”), Plaintiff. MARIA QUEZADA, was a guest and lawfully on the premises of Defendant, CARDENAS MARKETS, LLC, located at or near 4421 E. Bonanza Road, Las Vegas, Nevada, which was owned, managed, operated, controlled, inspected, maintained, cleaned, repaired, guarded, supervised, regulated and/or secured by Defendants, CARDENAS MARKETS, LLC, DOES 1 to 10, inclusive and ROE CORPORATIONS 1 to 10, inclusive and each of them (hereafter referred herein as “Subject Premises”, “Subject Location”, “Subject Property” and/or “Defendants’ Premises”).

10. On the Subject Date the Plaintiff, MARIA QUEZADA, slipped and fell due to peanut shells being on the floor constituting an unsafe condition at Defendant, CARDENAS MARKETS, LLC.

11. Defendants, CARDENAS MARKETS, LLC, DOES 1 to 10, inclusive and ROE CORPORATIONS 1 to 10, inclusive and each of them, had a duty towards guests on their premises to maintain the Subject Premises in a safe condition, warn of known dangers, and remedy dangers once they are known.

12. Defendants, CARDENAS MARKETS, LLC, and DOES 1 to 10, inclusive and ROE CORPORATIONS 1 to 10, inclusive were aware, or should have been aware that the area where the incident occurred contained a dangerous condition. Defendants knew or should have known that the area was unsafe and undertaken to warn, protect, clean, repair, or otherwise protect Plaintiff and other members of the public from this known danger.

13. As a direct and proximate cause of said Defendants’ and each of their, negligent

1 acts and/or omissions, as alleged herein above Plaintiff, MARIA QUEZADA, suffered severe and  
2 permanent physical and bodily injuries, received medical treatment for her injuries and damages.

3 **SECOND CAUSE OF ACTION**  
4 **(Premises Liability – All Defendants)**

5 14. Plaintiff repeats, re-alleges, and incorporates by reference herein, each and every  
6 allegation contained in Paragraphs 1 through 13 as though fully set forth herein.

7 15. Defendants, CARDENAS MARKETS, LLC, DOES 1 to 10, inclusive and ROE  
8 CORPORATIONS 1 to 10, inclusive and each of them are the owner of, or in control of the  
9 Subject Premises.

10 16. On or about April 26, 2021, Plaintiff, MARIA QUEZADA, was lawfully on the  
11 property of the Subject Premises that was owned, managed, operated, controlled, inspected,  
12 maintained, cleaned, repaired, guarded, supervised, regulated and/or secured by Defendants,  
13 CARDENAS MARKETS, LLC, DOES 1 to 10, inclusive and ROE CORPORATIONS 1 to 10,  
14 inclusive, and each of them.

15 17. On the Subject Date Defendants, CARDENAS MARKETS, LLC, DOES 1 to 10,  
16 inclusive and ROE CORPORATIONS 1 to 10, inclusive and each of them negligently owned,  
17 maintained, controlled, managed, operated, inspected, guarded, supervised, repaired, regulated  
18 and/or secured the Subject Premises, in that said Defendants, and each of them, knew, or in the  
19 exercise of reasonable care should have known, that said Subject Premises were at all times  
20 relevant hereto in a dangerous condition and constituted an unreasonable risk of harm to Plaintiff.  
21 MARIA QUEZADA, of which Plaintiff was unaware.

22 18. Further, said Defendants, and each of them, negligently and carelessly failed to  
23 maintain the premises in a safe condition or warn Plaintiff, MARIA QUEZADA, of its unsafe  
24 condition, so that on the Subject Date, the Plaintiff, MARIA QUEZADA, while in the area located  
at the Subject Premises, due to the lack of safety measures provided by Defendants, and each of

1 them, who were, or should have been aware on the Subject Premises that was negligently and  
2 carelessly owned, managed, operated, controlled, inspected, maintained, cleaned, repaired,  
3 guarded, supervised, regulated and/or secured by Defendants, CARDENAS MARKETS, LLC,  
4 DOES 1 to 10, inclusive and ROE CORPORATIONS 1 to 10, inclusive and each of them and/or  
5 said Defendants' and each of their, employees, contractors, representatives, agents and/or  
6 servants, causing Plaintiff, MARIA QUEZADA, to suffer severe and permanent injuries and  
7 damages.

8 19. The Subject dangerous condition created a reasonably foreseeable risk of the kind  
9 of injury which was incurred by Plaintiff and that Defendants, CARDENAS MARKETS, LLC,  
10 DOES 1 to 10, inclusive and ROE CORPORATIONS 1 to 10, inclusive and each of them had  
11 actual or constructive notice of the dangerous condition under a sufficient time, prior to the injury,  
12 to protect against the dangerous condition.

13 20. As a direct and proximate cause of said Defendants' and each of their, negligent  
14 acts and/or omissions, as alleged herein above Plaintiff, MARIA QUEZADA, suffered severe and  
15 permanent physical and bodily injuries, received medical treatment for her injuries and damages,  
16 and was treated for those injuries and damages by various health care providers, incurred medical,  
17 hospital, other related special economic damages, as well as past, present and future general  
18 damages for her pain, suffering and anguish.

19 WHEREFORE, Plaintiff prays for judgment against the Defendants, and each of them,  
20 for damages as follows:

- 21 1. For general damages for pain and suffering for MARIA QUEZADA in excess of  
22 \$15,000.00;
- 23 2. For special damages by way of medical expenses incurred by MARIA  
24 QUEZADA, in an amount in excess of \$15,000.00, the exact amount of which

shall be ascertained and proven at time of trial;

3. For an award of reasonable attorney fees together with costs of court incurred

herein;

4. For pre-judgment and post-judgment interest;

5. And for such other and further relief as to the Court shall seem proper.

DATED this 14<sup>th</sup> day of April, 2022.

**DEAVER | CRAFTON**

/s/ BRICE J. CRAFTON, ESQ.

NATHAN S. DEAVER, ESQ.

Nevada Bar No. 11947

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